

Exhibit 6

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JACK REESE, FRANCES ELAINE PIDDE,
JAMES CICHANOFSKY, ROGER MILLER,
GEORGE NOWLIN and RONALD HITT, on
behalf of themselves and
a similarly situated class,

Plaintiffs,

v.

CNH AMERICA LLC,
formerly known as
CASE CORPORATION,

Defendant.

Hon. Patrick J. Duggan

Case No. 04-70592

Class Action

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**PLAINTIFFS' SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS**

Plaintiffs, by their attorneys, KLIMIST, McKNIGHT, SALE, McCLOW & CANZANO, P.C., request, pursuant to Rule 34 of the Federal Rules of Civil Procedure, that Defendant Case produce the documents and records described below for inspection and copying at the offices of KLIMIST, McKNIGHT, SALE, McCLOW & CANZANO, P.C., 400 Galleria Officentre, Suite 117, Southfield, Michigan 48034, on or before February 8, 2005.

DEFINITIONS AND INSTRUCTIONS

1. "Related Companies" means J. I. Case, Case Corporation, Case LLC, CNH America LLC, CNH Global N.V., CaseNewHolland, Inc., Case New Holland, Inc., Fiatallis North America, Inc., Fiat SPA, Fiat Acquisition Company, their predecessors, parents, subsidiaries and divisions and the employees, representatives and agents of these entities.
2. "UAW" means the United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) and/or its Locals 152 (Hinsdale), 180 (Racine), 378 (Rockford), 689 (Terre Haute), 763 (St. Paul), 806 (Rock Island), 807 (Burlington), 858 (Bettendorf), 1004 (Southaven), 1304 (East Moline), 1306 (East Moline toolmakers), 1356 (East Moline clerical and technical), 1489 (Wausau) and 1571 (Indianapolis).
3. "Collective bargaining agreement" means all collectively bargained documents including Central Agreement(s), Local Agreement(s), Closing Agreement(s), letters of understanding, memoranda and supplemental agreements.
4. "Retiree" means a retired hourly employee from one of the facilities under a UAW/Case Central Agreement who was represented by the UAW for purposes of collective bargaining while an employee and who retired under the Case Pension Plan for Hourly Paid

Employees.

5. "Surviving Spouse" means any surviving spouse of a retiree.

6. "Plan" means the employee welfare benefit plan Case had established to provide health care benefits to retirees from one of Case's facilities and surviving spouses of such retirees.

7. "Document" means any and all notes, statements, minutes, memoranda, summaries, correspondence, contracts, records, messages, instructions, financial statements, work papers, book reports, diaries, articles, bills, billing statements, checks, checkbooks, ledgers, publications, charts, graphs, drawings, photographs, instruments, computer tapes or discs, program inputs, memories and outputs of every sort, and all other writings and papers of every kind or type (whether handwritten, typewritten, printed or other, regardless of form), tape recordings and other types of sound recordings in the possession, custody or control of the Related Companies.

8. "Possession, custody or control" includes the possession, custody or control of any of Related Companies' present or former directors, officers, employees, attorneys, accountants, agents or subsidiaries.

9. "Person" and "persons" include any natural person, firm, corporation, government entity, labor organization, partnership association, joint venture, group association and any other form of business organization or arrangement.

10. If a document which is within the scope of these requests can be identified but is not in your custody or control, please state:

- a. a description of the document;
- b. who has possession of it and its whereabouts;
- c. whether you had possession of it any time;

- d. whether you voluntarily or involuntarily transferred it to another; and if so,
- e. the circumstances surrounding such transfer, the authorization for such transfer and the date of such transfer.

11. With respect to any document for which you claim a privilege, identify the document, state the privilege involved, and state the factual and legal basis for the claimed privilege. Identify the document by stating:

- a. the type of document (letter, memo, etc.);
- b. the identity of the author;
- c. the date authored or originated;
- d. the identity of each person to whom the original or a copy was addressed or delivered;
- e. the identity of every other person who has ever had possession of the document;
- f. the subject matter of the document in sufficient detail to permit Plaintiffs to determine whether the asserted privilege applies.

12. Unless otherwise stated, these Requests cover the period from January 1, 1999 to the present.

13. If there are no documents responsive to a particular request, please provide a written response to that effect.

DOCUMENT REQUESTS

1. All documents which show the subsidiaries owned by Case Corporation prior to May 15, 1999 (i.e., the date of the Merger Agreement between Fiat SPA, New Holland N.V., Case Corporation and Fiat Acquisition Corporation).

2. All documents which show ownership of the subsidiaries in Request No. 1 after the consummation and implementation of the May 15, 1999 Merger Agreement.

3. All documents which show the assets owned and controlled by Case Corporation prior to the May 15, 1999 Merger Agreement.

4. All documents which show any change in the ownership and/or control of the assets of Case Corporation subsequent to the consummation and implementation of the May 15, 1999 Merger Agreement to present.

5. All documents, including minutes of meetings, pertaining to the decision of the officers, managers, members, board members and/or directors of any of the Related Companies to create Fiat Acquisition Corporation.

6. All documents which show the assets of Fiat Acquisition Corporation prior to the May 15, 1999 Merger Agreement.

7. All documents, including minutes of meetings, pertaining to the decision of the officers, managers, members, board members and/or directors of the Related Companies to convert Case Corporation to Case LLC.

8. All documents pertaining to any stockholder resolution to convert Case Corporation to Case LLC.

9. All documents, including minutes of meetings pertaining to the decision of officers, managers, members, board members and/or directors of the Related Companies that Fiatallis North America, Inc. would be the sole member of Case LLC.

10. All documents of the Related Companies pertaining to the limited liability agreement between Case LLC and Fiatallis North America, Inc.

11. All documents of Related Companies governing the direction and management of Case LLC by Fiatallis North America, Inc. or any other of the Related Companies.

12. All documents, including minutes of meetings, pertaining to the decision of officers, managers, members, board members and/or directors of the Related Companies to change Case LLC's name to CNH America LLC.

13. All documents, including minutes of meetings, pertaining to the decision of officers, managers, members, board members and/or directors of the Related Companies to transfer the membership rights of Fiatallis North America, Inc. in CNH America LLC to Case New Holland, Inc.

14. All documents of the Related Companies, including minutes of meetings of officers, managers, members, board members and/or directors, pertaining to the direction and management of CNH America LLC by Case New Holland, Inc. or any other of the Related Companies.

15. All documents of Related Companies pertaining to the limited liability agreement between CNH America LLC and Fiatallis North America, Inc.

16. All documents of the Related Companies pertaining to the limited liability agreement between CNH America LLC and Case New Holland, Inc.

17. All periodic financial reports, including balance sheets and profit and loss statements, of Case Corporation, Case LLC and CNH America LLC from January 1, 1999 to the present.

18. All documents pertaining to the assets and liabilities of Case Corporation, Case LLC and CNH America LLC from January 1, 1999 to the present.

19. All documents pertaining to the ownership or control of the assets of Case Corporation, Case LLC and CNH America LLC from January 1, 1999 to the present.

20. All periodic reports which disclose the revenues of Case Corporation, Case LLC or CNH America LLC from January 1, 1999 to the present.

21. All documents which pertain to the rights and obligations of the Related Companies with respect to the assets, liabilities and revenues of Case Corporation, Case LLC and/or CNH America LLC from 1999 to the present.

22. All communications to the UAW on "CNH Global N.V." letterhead or with a "CNH Global" and/or "CNH Global N.V." logo regarding the negotiation and/or administration of any collective bargaining agreement or the administration of any employee benefit plan during the period May 15, 1999 to the present.

23. All communications regarding health or pension benefits to employees, retirees and surviving spouses of retirees on "CNH Global N.V." letterhead or with a "CNH Global" or CNH Global N.V." logo from January 1, 1999 to the present.

24. All communications to the UAW on "Case LLC" letterhead or with a "Case LLC" logo regarding the negotiation and/or administration of any collective bargaining agreement or the administration of any employee benefits plan during the period May 15, 1999 to the present.

25. All communications to employees, retirees or surviving spouses of retirees regarding health or pension benefits on "Case LLC" letterhead or with a "Case LLC" logo during the period May 15, 1999 to the present.

26. All documents which show the officers, managers, members, board members and/or directors of Case Corporation prior to the May 15, 1999 Merger Agreement and every change in such officers, managers, members, board members and/or directors of Case Corporation, Case LLC and/or CNH America LLC from May 15, 1999 to the present.

27. Organization charts or similar documents which show the relationship between the Related Companies from January 1, 1999 to the present.

Respectfully submitted,

KLIMIST, McKNIGHT, SALE,
McCLOW & CANZANO, P.C.

By: 

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Dated: January 9, 2006

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